NPSTC
National Public Safety Telecommunications Council

September 25, 2019

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: PS Docket No. 07-114, Wireless 9-1-1 Location Accuracy

Dear Ms. Dortch:

The National Public Safety Telecommunications Council (NPSTC) is a federation of public safety organizations whose mission is to improve public safety communications and interoperability through collaborative leadership. NPSTC pursues the role of resource and advocate for public safety organizations in the United States on matters relating to public safety telecommunications. Accordingly, NPSTC provides guidance on issues that can either negatively impact or benefit the operation of public safety communications.

Unfortunately, the latest Ex Parte filings by the wireless carrier community in the above-captioned proceeding appear to be headed toward more delay in actually implementing accurate 911 location. NPSTC urges the Commission to hold fast to the 2021 and 2023 deadlines established in the Fourth Report and Order, regardless of any further testing carriers may plan to conduct.

NPSTC views location accuracy to be extremely important to first responders and the public they serve. Countless members of the public who have been harmed by fires, medical emergencies or criminal activity can attest that the expeditious arrival of firefighters, emergency medical personal or law enforcement was a key factor in minimizing their injuries or chance of death from such emergency situations. Expeditious arrival of first responders requires that they have accurate

information on the location where help is needed. For multi-story facilities, that entails not just an accurate building address, but also the floor where victims are located.

Recognizing the importance of this issue, the Commission initiated a rulemaking on indoor 911 location accuracy in February, 2014.[1] At that time, now over five and a half years ago, the Commission stated "We believe the time has come to propose specific measures in our E911 location accuracy rules to ensure accurate indoor location information." [2] Numerous filings from the public safety community, industry and wireless carriers that began in response to that Third Further NPRM have continued to set forth the benefits of indoor 911 location. A year after release of the Third Further NPRM, the Commission defined requirements for indoor 911 location accuracy, including vertical location. The Commission's 2015 Fourth Report and Order established the following vertical location requirements, considering the effective date of the rules adopted:[3]

> By April 3, 2021:
>
> Nationwide providers must provide either (1) dispatchable location, or (2) vertical (z-axis) location information in compliance with the FCC-approved metric, in each of the top 25 Cellular Market Areas (CMAs). If dispatchable location is used, there must be a density of reference points distributed throughout the CMA equivalent to 25 percent of the population in that CMA. If vertical location technology is used, it must be deployed to cover 80 percent of the CMA population.[4]
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> By April 3, 2023:
>
> Nationwide providers must provide either (1) dispatchable location, or (2) vertical (z-axis) location information in compliance with the FCC-approved metric, in each of the top 50 CMAs. If dispatchable location is used, there must be a density of reference points distributed throughout the CMA equivalent to 25 percent of the population in that CMA. If vertical location technology is used, it must be deployed to cover 80 percent of the CMA population.[5]

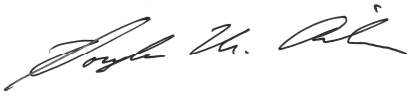
[1] Third Further Notice of Proposed Rulemaking (NPRM), PS Docket No. 07-114, released February 21, 2014.
[2] Third Further NPRM at para 2.
[3] Fourth Report and Order, PS Docket No. 07-114, released February 3, 2015.
[4] 47 C.F.R. § 20.18(i)(2)(ii)(C)
[5] (47 C.F.R. § 20.18(i)(2)(ii)(D))

Since release of these requirements over four and a half years ago, numerous tests and filings have been provided on the Z Axis alternative to dispatchable location. Yet, recent Ex Parte filings by CTIA state:

> With regard to Z-axis, CTIA again expressed support for the Commission's proposed ±3-meter Z-axis metric as an important target to achieve but urged the Commission to consider a phased-in approach [emphasis added] that reflects the nascent and evolving state of commercially available vertical location technologies that will be demonstrated in the upcoming 9-1-1 Location Accuracy Test Bed LLC's Stage Za.[6]

The Commission has already provided carriers a phased-in approach with the 2021 and 2023 deadlines. Therefore, the CTIA reference appears to be Washington-speak for additional delays in getting first responders the location information they need. Accordingly, NPSTC urges the Commission to maintain the 2021 and 2023 deadlines established in the Fourth Report and Order and ensure those requirements are fully met, regardless of any further testing wireless carriers may deem appropriate.

Respectfully submitted,



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[6] CTIA Ex Parte filing September 11, 2019.